

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
THOMAS M. JOHNSON, III,	:	CHAPTER 11
Debtor-in-Possession	:	
	:	
THE BANK OF NEW YORK MELLON	:	CASE NO. 1-10-bk-01151-RNO
f/k/a THE BANK OF NEW YORK AS	:	
SUCCESSOR IN INTEREST TO JP	:	
MORGAN CHASE BANK, N.A. AS	:	
TRUSTEE FOR STRUCTURED ASSET	:	
MORTGAGE INVESTMENTS II TRUST	:	
2006-AR7 MORTGAGE PASS-THROUGH	:	
CERTIFICATES SERIES 2006-A7	:	
Movant	:	
	:	
v.	:	
	:	
THOMAS M. JOHNSON, III	:	
Respondent	:	

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Debtor, Thomas M. Johnson, III, by and through his counsel, Law Offices of Craig A. Diehl, answering the Motion for Relief from Automatic Stay under §362 pursuant to Bankruptcy Procedure Rule 4001 of the Bankruptcy Code as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Proof thereof is requested at trial.

7. Denied. This Bankruptcy proceeding was commenced in 2010. To suggest minimal equity exists nine (9) years later without an appraisal is merely speculation.

8. Denied. Debtor has made the following mortgage payments to Nationstar:

<u>Date Posted</u>	<u>Payment Amount</u>
10/05/2018	\$ 6,529.75
11/08/2018	\$ 5,636.78
12/06/2018	\$ 5,636.78
01/02/2019	\$ 5,636.78
03/01/2019	\$ 5,636.78
04/01/2019	\$ 5,636.78
04/02/2019	\$ 5,636.78
05/02/2019	\$ 5,636.78
07/01/2019	\$ 5,636.78
08/02/2019	\$ 5,636.78
09/05/2019	<u>\$ 5,636.78</u>
	\$62,897.55

9. Admitted.

10. Denied. Debtor has made post-petition payments

WHEREFORE, Debtor, Thomas M. Johnson, III, respectfully requests this Court deny Movant's Motion for Relief from the Automatic Stay.

Respectfully submitted,

LAW OFFICES OF CRAIG A. DIEHL

Date: December 20, 2019

By: /s/ Craig A. Diehl, Esq., CPA
Craig A. Diehl, Esquire, CPA
Attorney ID No. 52801
3464 Trindle Road
Camp Hill, PA 17011
(717)763-7613
Attorney for Debtor-in-Possession